

GLENN AGRE BERGMAN & FUENTES LLP

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July 28, 2022

Via ECF

Clerk of the Court  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, New York 10004

Re: ***Request for Foreign Service by Mail Pursuant to FRCP 4(f)(2)(C)(ii)***  
In re Orly Genger, Ch. 7, Case No. 19-13895 (JLG);  
Adv. Proc. No. 22-01106-JLG

To the Honorable Clerk of Court:

On behalf of the Debtor Orly Genger in the above-referenced Chapter 7 bankruptcy, who is also a plaintiff in the above-referenced adversary proceeding, we submit this request for foreign service of process.

We provided to the Clerk's Office pre-labeled and addressed mail envelopes along with hard copies of the complaint and second summons in this adversary proceeding to be mailed as service of process to a named defendant at his addresses in Israel. We respectfully request, pursuant to Federal Rule of Civil Procedure 4(f)(2)(C)(ii), that the Clerk's Office effect foreign service under the Hague Convention Article 10(a), the Israel Ratification and Response, and FRCP 4(f)(2)(C)(ii), by sending through postal channels using the pre-addressed mail envelopes provided to the Clerk's Office a copy of the complaint and the second summons to each of the addresses below.

• Items to Be Served (and placed in pre-addressed mail envelopes):

1. **Complaint**, encaptioned, *Deborah J. Piazza, as chapter 7 trustee of the Orly Genger estate, Orly Genger, Arie Genger, David Broser, and ADBG LLC (plaintiffs) v. Dalia Genger, Sagi Genger, Michael Oldner, Elana Genger, Manhattan Safety Maine, Inc., Recovery Effort, Inc., Robin Rodriguez, D&K GP LLC, TPR Investment Associates, Inc., The Orly Genger 1993 Trust, Created by Trust Agreement Dated December 13, 1993 between Arie*

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*Genger, as Grantor, and Lawrence M. Small and Sash A. Spencer,  
as Trustees, John Dellaportas, David Parnes, and John and Jane  
Does 1 through 10, and dated June 10, 2022.*

2. **Second Summons**, dated July 13, 2022

• Foreign Addresses of Party (as reflected on the pre-labeled mail envelopes):

David Parnes  
29 Elkachi Street  
Tel-Aviv 69497, Israel

David Parnes  
16 Yehiam St.  
Ramat Hasharon, 4730121, Israel

David Parnes  
18A Raul Wallenberg St, Building C,  
Tel-Aviv 6971915, Israel

Thank you for your assistance.

Respectfully submitted,

/s/ Michael Paul Bowen  
Michael Paul Bowen

cc: All Counsel (via ECF)